## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

STEPHEN KENJI LE BROCQ	§	
	§	
Plaintiff,	§	
	§	
VS.	§	
	§	No. 3:18-cv-01423-S
THE CITY OF CARROLLTON, TEXAS;	§	
FANNING HARPER MARTINSON BRANDT	§	
& KUTCHIN, P.C; a Texas Professional	§	
Corporation and THOMAS P. BRANDT,	§	
Individually; MERIDETH LADD;	§	
SUSAN KELLER; and MARY SCANLON	8	
	§	
Defendants.	§	

# UNOPPOSED MOTION TO EXTEND TIME TO FILE A RESPONSE TO DEFENDANTS' MOTIONS TO DISMISS

Plaintiff Stephen Kenji Le Brocq respectfully files this Unopposed Motion to Extend Time to File a Response to Defendants' Motions to Dismiss.

Defendants filed 3 separate Motions to Dismiss pursuant to Fed. R. Civ. P. 12(b)(6) on July 3, 2018: City of Carrollton, Texas (Dkt. 11); the Individual City Defendants (Dkt. 12); and Fanning, Harper, Martinson, Brandt & Kutchin, P.C. (Dkt. 13). The current response deadline for all 3 motions is July 24, 2018.

Plaintiff requests a deadline for filing his responses to the defendants' motions because he is preparing for multiple jury trials, working on a Reply brief for a pending appellate matter and handling many other civil and criminal matters, some cases involving individuals that are currently incarcerated. For this reason, Plaintiff requests an extension of time until <u>August 7, 2018</u> to respond to the motions.

Plaintiff has conferred with counsel for all defendants, all of whom are unopposed to the granting of this request.

WHEREFORE, PREMISES CONSIDERED, Plaintiff respectfully requests this Court to enter an Order extending the due date for Plaintiff's responses to Defendants' 12(b)(6) motions to dismiss until August 7, 2018.

Respectfully submitted,

### LE BROCQ LAW FIRM PLLC

/s/ Stephen Le Brocq Stephen Le Brocq Texas SBN: 24094791

E: stephen@lebrocqlawgroup.com

Plaza of Josey Ranch 2150 North Josey Lane, Suite 227 Carrollton, Texas 75006

Phone: (469) 930-4385 Fax: (866) 820-6005

Email: <u>SERVICE@lebrocqlawgroup.com</u>

Attorneys for Plaintiff

#### **CERTIFICATE OF CONFERENCE**

In compliance with Local Rule 7.1, I certify that on July 17, 2018, I conferred with Darrell Noga, attorney for Thomas Brandt and the City Defendants in this case. Mr. Noga indicated that he is unopposed to this motion. Furthermore, by way of e-mail on July 17, 2018, I communicated with attorney Laura O'Leary, on behalf of Fanning Harper Martinson Brandt & Kutchin, P.C. and was informed that she is also unopposed to this motion.

#### **CERTIFICATE OF SERVICE**

I certify that on July 17, 2018, I electronically submitted the foregoing document for filing with the United States District Court for the Northern District of Texas using the electronic case filing system of the Court, and that all counsel of record will be provided a "Notice of Electronic Filing" and access to this document.

/s/ Stephen Le Brocq